

**DEFENDANT TRAVIS COUNTY CLERK DANA DEBEAUVOIR'S CONSOLIDATED
INITIAL DISCLOSURES PURSUANT TO F.R.C.P. 26(a)(1), (2)**¹

COMES NOW, Defendant Dana DeBeauvoir, in her official capacity as Travis County Clerk, through her attorney of record, the Travis County Attorney and makes these Initial Disclosures pursuant to Federal Rules of Civil Procedure 26(a)(1), (2).

PRELIMINARY STATEMENT

This case is in the preliminary phases. The initial disclosures set forth below are necessarily made without full knowledge of the facts and circumstances involved in this case and are made in a good-faith effort to comply with Fed. R. Civ. Pro. 26(a)(1). In making these disclosures, Defendant DeBeauvoir does not represent that she is identifying every individual, document, or tangible thing upon which she may rely to support her defenses; further discovery, investigation, legal research, and analysis may supply additional facts and new meaning to known facts, as well as establish new factual conclusions and legal contentions, all of which may lead to substantial changes, additions to, and variation from the disclosures. Accordingly, Defendant DeBeauvoir reserves the right to amend these disclosures in accordance with subsequent developments, and further makes these disclosures without prejudice to her right to produce facts, witnesses, documents, and other evidence omitted from these responses by oversight, inadvertence, good-faith error, or mistake. Defendant DeBeauvoir further notes that the information set forth in these disclosures may include hearsay and other forms of information that are unreliable, irrelevant, or not otherwise admissible in evidence. Defendant DeBeauvoir, therefore, reserves all objections relating to the admissibility of evidence.

Defendant DeBeauvoir reserves objections to specific deposition notices and discovery requests and questions, on the ground that although information possessed by individuals listed

¹ Defendant DeBeauvoir makes her initial disclosures as a defendant in *Texas LULAC, et al. v. Jose Esparza, et al.*, 1:21-CV-0786-XR and *OCA-Greater Houston, et al. v. Jose Esparza, et al.*, 1:21-CV-0780-XR, now consolidated with *La Union Del Pueblo Entero, et al. v. Gregory Abbott, et al.*, 5:21-CV-0844-X4.

below may be discoverable, the information might not be discoverable from a specific witness based on privileges or other grounds that Defendant DeBeauvoir will assert upon receipt of specific discovery requests. Defendant DeBeauvoir also reserves objections to the disclosure of any information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

**I. FRCP 26(a)(1)A - INDIVIDUALS LIKELY
TO HAVE DISCOVERABLE INFORMATION**

**OBJECTION: NO HOME ADDRESS AND PHONE FOR THOSE
EMPLOYED BY A UNIT OF GOVERNMENT**

Defendant DeBeauvoir objects to providing home addresses and telephone numbers of persons employed by Travis County because such information is confidential by law. *See*, Tex. Gov't Code 552.117 as well as being protected by common law privacy and the right to be free from potential physical harm. *See, Texas Dept. of Public Safety v. Cox Newspapers*, 343 S.W.2d 112 (Tex. 2011). Current elected officials and employees of Travis County should be contacted through the Travis County Attorney's Office; however, Defendant provides a centralized work address and phone number for these individuals below:

1. **Dana DeBeauvoir**
Travis County Clerk
5501 Airport Blvd
Austin, TX 78751
c/o Travis County Attorney's Office
P.O. Box 1748
Austin, Texas 78767

County Clerk DeBeauvoir is a Defendant herein in her official capacity as the Travis County Clerk. She has knowledge of the claims asserted by Plaintiffs and Defendants herein, as well as the elections process administered by the Travis County Clerk's Office in general.

2. **Bridgette Escobedo**
Travis County Clerk's Office
Elections Division Director
5501 Airport Blvd
Austin, TX 78751
c/o Travis County Attorney's Office
P.O. Box 1748
Austin, Texas 78767

Ms. Escobedo is employed by Travis County Clerk DeBeauvoir as the Elections Division Director. In her position as the Elections Division Director she has knowledge pertaining to the claims asserted by Plaintiffs and Defendants herein, as well as the elections process administered by the Travis County Clerk's Office, Elections Division in general.

PLAINTIFFS:

3. LULAC Texas

c/o Counsel for Plaintiff LULAC Texas

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This plaintiff has information concerning their membership and activities regarding SB 1.

4. VOTO LATINO

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5. Texas Alliance for Retired Americans
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7. **OCA Greater Houston**

c/o Attorneys for Consolidated Plaintiff OCA-Greater Houston, League of Women Voters, REVUP-Texas, Texas Organizing Project, Workers Defense Action Fund

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8. **League of Women Voters of Texas**

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9. **Revup-Texas**

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10. Texas Organizing Project

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11. Workers Defense Action Fund

c/o Attorneys for Consolidated Plaintiff OCA-Greater Houston, League of Women Voters,
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This plaintiff has information concerning their membership and activities regarding SB 1.

COUNTY ELECTIONS ADMINISTRATOR DEFENDANTS:

12. Jacquelyn Callanen

Bexar County Elections Administrator

c/o attorney
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Bexar County Criminal District Attorney's Office
Assistant District Attorney, Civil Division
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robert.green@bexar.org

Ms. Callanen is a Defendant herein in her official capacity as the Bexar County Elections Administrator. She is presumed to have knowledge of the claims asserted by Plaintiffs and Defendants herein, as well as the Bexar County elections process in general.

13. Isabel Longoria

Harris County Elections Administrator

c/o attorneys

Tiffany S. Bingham

Managing Counsel

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Harris County Attorney's Office

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Houston, TX 77002

(713) 274-5142

Ms. Longoria is a Defendant herein in her official capacity as the Harris County Elections Administrator. She is presumed to have knowledge of the claims asserted by Plaintiffs and Defendants, as well as the Harris County elections process in general.

14. Yvonne Ramon

Hidalgo County Elections Administrator

c/o attorneys

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Ms. Ramon is a Defendant herein in her official capacity as the Hidalgo County Elections Administrator. She is presumed have knowledge of the claims asserted by Plaintiffs and Defendants, as well as the Hidalgo County elections process in general.

15. Michael Scarpello

Dallas County Elections Administrator

c/o attorneys

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Mr. Scarpello is a Defendant herein in his official capacity as the Dallas County Elections Administrator. He is presumed to have knowledge of the claims asserted by Plaintiffs and Defendants, as well as the Dallas County elections process in general.

16. Lisa Wise

El Paso County Elections Administrator

c/o attorneys

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Ms. Wise is a Defendant herein in her official capacity as the El Paso County Elections Administrator. She is presumed to have knowledge of the claims asserted by Plaintiffs and Defendants, as well as the El Paso County elections process in general.

STATE OF TEXAS DEFENDANTS:

P.O. Box 12548
Austin, Texas 78711-2548

Each person has knowledge of relevant State of Texas policies, procedures, and practices.

17. Jose Esparza

Former Interim Texas Secretary of State
Represented by Eric A. Hudson
Office of Attorney General
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Austin, TX 78711
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Deputy Secretary Esparza is a Defendant herein. He and his employees, whose identities are not known, will have knowledge of the claims asserted by Plaintiffs and Defendants, as well as the voter registration process, elections results, and voting records in general.

18. Ken Paxton

Texas Attorney General
Represented by Eric A. Hudson
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Attorney General Paxton is a Defendant herein. He and his employees, whose identities are not known, will have knowledge of the claims asserted by Plaintiffs and Defendants.

II. EXPERT WITNESSES DISCLOSED UNDER FRCP 26 (2) (C)

Attorney Fees Experts

19. Leslie W. Dippel
Assistant Travis County Attorney
314 W. 11th Street, Suite 500
Austin, Texas 78701
(512) 854-9513

May testify as to reasonable and necessary attorney's fees related to this case.

20. Sherine E. Thomas
Executive County Attorney
314 W. 11th Street, Suite 500
Austin, Texas 78701
(512) 854-9513

May testify as to reasonable and necessary attorney's fees related to this case.

21. Anthony J. Nelson
Assistant Travis County Attorney
314 W. 11th Street, Suite 500
Austin, Texas 78701
(512) 854-9316

May testify as to reasonable and necessary attorney's fees in defense of this case.

22. Patrick Pope
Assistant Travis County Attorney
314 W. 11th Street, Suite 500
Austin, Texas 78701
(512) 854-9316

May testify as to reasonable and necessary attorney's fees in defense of this case.

Defendant DeBeauvoir further reserves the right to call any witness or expert witness identified by Plaintiffs, Co-Defendants, or any other party discovered in any disclosures or in any Designation of Potential Witnesses filed with the Court.

III. DOCUMENTARY EVIDENCE

Description of Documents (FRCP Rule 26(a)(1)(A.)(ii))

Pursuant to FRCP 26 (a) ii, Defendant provides the following description by category and location of the following documents in Defendant's possession, custody or control that may be used to support claims or defenses unless the use would be solely for impeachment.

1. SB 1, 87th Leg., 2d Called Sess. (Tex. 2021).
2. The legislative history of SB 1 some of which can be found at: <https://capitol.texas.gov/BillLookup/Actions.aspx?LegSess=872&Bill=SB1>

Additionally, in her capacity as Travis County Clerk, Defendant DeBeauvoir has custody and control of various Travis County election and voting/voter records. Defendant DeBeauvoir is uncertain at this time whether all or a portion of such records would be relevant to the claims asserted by Plaintiffs, and defenses asserted by Defendant DeBeauvoir or other Co-Defendants in this lawsuit. In any event, Defendant DeBeauvoir understands and believes that Plaintiffs may be seeking records, documents, information, and materials only during relevant time periods. These records might also include guidance materials to be provided to the Travis County Clerk's Office Elections Division by the Texas Secretary of State and internal policies, procedures, and documents relative to administration of elections by the Travis County Clerk's Office, Elections Division.

Defendant DeBeauvoir reserves the right to supplement her list of potential exhibits. Defendant DeBeauvoir also reserves the right to seek to protect private and confidential information. Defendant DeBeauvoir further reserves the right to introduce as an exhibit any document or tangible items produced or identified by Plaintiffs or Co-Defendants through disclosures, in written discovery response, or by oral deposition. Defendant DeBeauvoir further reserves the right to call any witnesses or expert witnesses identified by Plaintiffs or Co-Defendants through disclosures, in written discovery response, or by oral deposition. Defendant DeBeauvoir further reserves the right to call any witnesses or expert witnesses identified by Plaintiffs through disclosures or in discovery.

IV. DAMAGES AND INSURANCE

Computation of Damages Claimed by Disclosing Party (FRCP Rule 26(a)(1)(iii))

Defendant DeBeauvoir claims no damages under FRCP 26 (A) iii at this time; however, Defendant DeBeauvoir reserves the right to seek Travis County's costs and expenses incurred in defending this civil action.

Insurance Agreements Triggered by a Judgment (FRCP Rule 26(a)(1)(A.)(iv))

Travis County is self-insured, and there is no insurance agreement within the meaning of in FRCP 26(a)(1)(A.)(iv).

Respectfully submitted,

DELIA GARZA

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**ATTORNEYS FOR DEFENDANT DANA
DEBEAUVOIR, IN HER OFFICIAL
CAPACITY AS TRAVIS COUNTY CLERK**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Defendant Travis County Clerk Dana DeBeauvoir's Initial Disclosures Pursuant to F.R.C.P. 26(a)(1), (2) has been delivered on this the 5th day of November, 2021, via electronic mail as follows:

<p>Jessica Ring Amunson Urja Mittal Jenner & Block LLP 1099 New York Avenue, #900 Washington, DC 20001 jamunson@jenner.com umittal@jenner.com <i>Attorneys for OCA-Greater Houston</i></p>	<p>Thomas Paul Buser-Clancy Ashley Alcantara Harris Savannah Kumar ACLU Foundation of Texas P.O. Box 8306 Houston, TX 77288 tbuser-clancy@aclutx.org aharris@aclutx.org skumar@aclutx.org <i>Attorneys for OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, Texas Organizing Project, and Workers Defense Action Fund,</i></p>
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<p>Adriel Cepeda-Derieux Sophia Lin Lakin Samantha Osaki American Civil Liberties Union Foundation 125 Broadway Street, 18th Floor New York, NY 10004 acepedaderieux@aclu.org slakin@aclu.org sosaki@aclu.org Attorneys for OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, Texas Organizing Project, and Workers Defense Action Fund</p>	<p>Andre I. Segura Andre Ivan Segura Law Office 5225 Katy Freeway, Suite 350 Houston, TX 77007 asegura@aclutx.org Attorney for OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, Texas Organizing Project, and Workers Defense Action Fund</p>
<p>Lia Sifuentes Davis Disability Rights Texas 2222 West Braker Lane Austin, TX 78758 ldavis@drtx.org Attorneys for OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, Texas Organizing Project, and Workers Defense Action Fund</p>	<p>Lucia Romano Ostrom Disability Rights Texas 1500 McGowen - Ste 100 Houston, TX 77004 lostrom@drtx.org Attorney for OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, Texas Organizing Project, and Workers Defense Action Fund</p>
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